IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	PAMELA DOOLEY ROMAN	)
		) Group Art Unit:
Serial No.:	10/602,250	) 3629
		) Examiner:
Filed:	June 23, 2003	) Cumarasegaran
		)
For:	CROSS-DOMAIN ENTITY RELATIONSHIP	)
	MODEL FOR MANAGING DATA RELATED	)
	TO COMMUNICATIONS PRODUCTS	)

Mail Stop AF
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REQUEST FOR PRE-APPEAL BRIEF CONFERENCE

In response to the Final Office Action mailed October 9, 2008, and in conjunction with the concurrently filed Notice of Appeal, Applicant requests a Pre-Appeal Brief Conference in view of the following remarks.

<center>REMARKS</center>

In response to the final Office Action dated October 9, 2008, Applicant respectfully requests reconsideration in a Pre-Appeal Brief Conference based on the following remarks. Reconsideration and allowance of the claims are respectfully requested in view of the following remarks.

Claims 1-12 were rejected under 35 U.S.C. § 103 as being unpatentable over Hahn-Carlson in view of Spencer. This rejection is traversed for the following reasons.

Claim 1 recites, *inter alia,* "generating views of product instances, the views including customer-oriented views, account-oriented views and location-oriented views, the product instances depicted in a space, the customer-oriented views, account-oriented views and location-oriented views being depicted as regions in the space." Support for these features is found in at least Figure 3 and paragraph [0034] of Applicant's specification. Neither Hahn-Carlson nor Spencer teaches or suggests these features. Hahn-Carlson teaches establishing contract data between a buyer and a seller, and displaying catalog items to the buyer and displaying contracts to a buyer, but does not teach generating the views in the format recited in claim 1. Spencer teaches an electronic address book which will display fields of an address entry, but not in a format of the views of product instances as recited in claim 1. Thus, even if Hahn-Carlson and Spencer are combined, the elements of claim 1 do not result.

In the response to Applicant's arguments that Hahn-Carlson does not teach the views recited in claim 1, the Examiner cites to paragraph [0036] of Hahn-Carlson. Paragraph [0036] is provided below.

> In another example embodiment, a central database and transaction management system uses four types of data to manage transactions. The types of data include security/privilege data, access-control data, entity profile data, and business rules data. Security/privilege and access control data types provide the appropriate levels of protection (e.g., log-in and password data) to the data stored and processed by the system and also provide access to such information at various levels/hierarchies within each company. For example, once a company is enrolled or registered to use the system, initial implementation includes definition of operational filters that define how a user (within an organization level or otherwise) can access the transaction information and/or interact with the system. Such operational filters can include, for example, filters that limit the extent to which a user (e.g.,

employee or agent of the company) can: approve/hold/deny/cancel/update transactional steps, view transaction-related data, and analyze the data.

This section of Hahn-Carlson fails to teach "generating views of product instances, the views including customer-oriented views, account-oriented views and location-oriented views, the product instances depicted in a space, the customer-oriented views, account-oriented views and location-oriented views being depicted as regions in the space" recited in claim 1. Paragraph [0036] deals with controlling access to data within an organization. This section makes a single reference to viewing transaction-related data, but does not teach or suggest the various views recited in claim 1. Thus, Applicant submits that the Examiner's interpretation of Hahn-Carlson is flawed.

For at least the above reasons, claim 1 is patentable over Hahn-Carlson in view of Spencer. Claims 2-6 variously depend from claim 1 and are patentable over Hahn-Carlson in view of Spencer for at least the reasons advanced with reference to claim 1.

Claim 7 recites "the cross-domain data model facilitating generation of views of product instances, the views including customer-oriented views, account-oriented views and location-oriented views, the product instances depicted in a space, the customer-oriented views, account-oriented views and location-oriented views being depicted as regions in the space." As noted above, neither Hahn-Carlson nor Spencer teaches these features. Claim 7 and is patentable over Hahn-Carlson in view of Spencer for at least the reasons advanced with reference to claim 1. Claims 8-12 depend from claim 7 and are considered patentable for at least the same reasons.

In view of the foregoing remarks and amendments, Applicant submits that the above-identified application is now in condition for allowance. Early notification to this effect is respectfully requested.

If there are any charges with respect to this response or otherwise, please charge them to Deposit Account 06-1130.

Respectfully submitted,
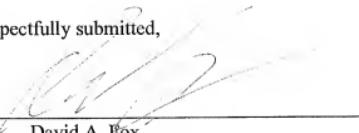
By: _____
David A. Fox
Registration No. 38,807
CANTOR COLBURN LLP
20 Church Street
22nd Floor
Hartford, CT 06103-3207
Telephone (860) 286-2929
Facsimile (860) 286-0115
Customer No. 36192

Date: January 9, 2009